

REMARKS

In response to the Office Action of February 23, 2006, the abstract has been amended to contain fewer than 150 words and to better describe the invention. The specification has also been amended at various passages in order to correct typographical errors. For example, Chart 7 contains an obvious clerical error, whereby the average force of Piston 300 at T=0 is incorrectly identified as "21.7" instead of "1.7". As no new matter is being added by these amendments, it is respectfully requested that they be entered. Claim 1 has also been amended to correct a typographical error.

With regard to the rejection of claims 1-19, Applicants respectfully submit that the claimed subject matter is not anticipated or made obvious by the cited prior art. Claims 12-15 stand rejected under 35 U.S.C. 102(b) as being anticipated by Sawa et al. The Office Action makes reference to Figs. 2 and 5 of Sawa et al. and states: "The Sawa threads have major and minor diameters, wherein the major and minor diameters of one of the first and second mating members are smaller than the major and minor diameters of the other of the first and second mating members." Applicants believe that the Examiner is referring to the horizontal lines along the upper and lower extents of the (unnumbered) plunger rod thread. These lines do not represent a relatively small plunger rod thread, nor would they be understood by one of ordinary skill in the art to represent a smaller plunger rod thread. On the contrary, these lines are contour lines which illustrate the curvature of the thread, in accordance with standard drafting practice. Similar contour lines may be seen at the upper and lower extents of the (unnumbered) rod base, just to the right of the reference lines for elements 21 and 90a,

respectively. Of course, the curvature of the other structures, such as the enlarged portions 21 of the seal 20 is not illustrated because they are shown in sectional view, unlike the plunger rod threads and base.

Indeed, further support for this interpretation of Figs. 2 and 5 of Sawa et al. can be found by reviewing the specification. The specification of Sawa et al. fails to recognize the problem identified in the present application and also fails to describe a connection configuration wherein the major and minor diameter of the threads of one of the plunger rod and the seal are smaller than the major and minor diameter of the threads of the other. Accordingly, Sawa et al. fails to anticipate or suggest the subject matter of claims 12-15, and reconsideration and allowance of independent claim 12 and all claims depending therefrom is respectfully requested. As claim 12 is patentable for the above reasons, the dependent claims 16-19 also should be allowable.

Turning now to claim 1, it and all of its dependent claims have been rejected as being unpatentable over Woodworth et al. in view of Scheiner (for claims 1-5) and in further view of Sawa et al. (for claims 6-11). It is respectfully submitted that claim 1, and the respective dependent claims 6-11, are patentable for the reasons which follow.

The Office Action states that Woodworth et al. discloses the syringe assembly of claim 1, except for a parylene coating on an outer surface of the piston. The Office Action continues by stating that Scheiner et al. teaches a parylene coating to provide a non-thrombogenic encapsulate moisture barrier and insulate, and that it would have been obvious to modify the Woodworth et al. device with the coating of Scheiner et al. Applicants acknowledge that Scheiner et al. does describe the use of parylene to coat

an electrode for cardiac implantation, but we submit the combination of Woodworth et al. and Scheiner et al. is improper.

Per M.P.E.P. Section 2143.01, there must be some motivation to combine the references used in an obviousness rejection. Scheiner et al. is in an entirely different field of endeavor than Woodworth et al. and the present invention, as one of ordinary skill in the art would not look to an electrode implantation lead system for the solution to a problem in the field of injection syringes. Furthermore, Scheiner et al. is directed to an entirely different problem than that of Woodworth et al. and the present invention. Scheiner et al. does not use parylene as a lubricant, nor does it recognize any of its lubricating properties. Instead, Scheiner et al. (at column 36, lines 20-56 and column 38, lines 6-26) describes parylene as an insulating coating that increases the impedance of an implantable electrode. Thus, there is no motivation to combine Woodworth et al. and Scheiner et al., so it is respectfully submitted that claim 1 and all claims depending therefrom would not have been obvious to one of ordinary skill.

In addition to the foregoing reasons, claim 1 and all claims depending therefrom are patentable because even the unlikely combination of Woodworth et al. and Scheiner et al. does not result in all of the elements of claim 1. Claim 1 requires an elastomeric piston having a parylene coating on an outer surface thereof. Woodworth et al. only describes (in paragraphs 47, 54, and 66) a device wherein the interior of the syringe body is lubricated, rather than applying a coating to an outer surface of the piston. As Scheiner et al. fails to provide this missing element, it is respectfully submitted that this

is another reason why claim 1 and all claims depending therefrom are patentable over the combination of Woodworth et al. and Scheiner et al.

CONCLUSION

For the above reasons, it is respectfully submitted that the specification is now in a proper form and that the claims are in condition for allowance. Accordingly, reconsideration and allowance are respectfully requested.

Respectfully submitted,

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